

Hearing Date and Time: August 6, 2010 at 9:45 a.m.
Objection Deadline: June 18, 2010 at 4:00 p.m.
Reply Deadline: July 12, 2010 at 4:00 p.m.
Cross-Motion Reply Deadline: August 2, 2010 at 4:00 p.m.

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:)	Chapter 11
)	
MOTORS LIQUIDATION COMPANY,)	Case No. 09-50026 (REG)
<i>et al.,</i>)	
)	
Debtors.)	(Jointly Administered)

**NOTICE OF HEARING ON DEBTORS' OBJECTION TO
DEUTSCHE BANK AG'S MOTION FOR RELIEF FROM AUTOMATIC STAY
TO EFFECT SETOFF AND CROSS-MOTION FOR IMMEDIATE PAYMENT**

PLEASE TAKE NOTICE THAT a hearing will be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, on August 6, 2010 at 9:45 a.m. in Room 621 of the United States Bankruptcy Court for the Southern District of New York ("**Bankruptcy Court**"), One Bowling Green, New York, New York 10004-1408, or as soon thereafter as counsel can be heard, to consider the Debtors' Objection to Deutsche Bank AG's Motion for Relief from Automatic Stay to Effect Setoff and Cross-Motion for Immediate Payment (the "**Cross-Motion**").

PLEASE TAKE FURTHER NOTICE that responses, if any, to the Cross-Motion must: (a) be made in writing, stating in detail the reasons therefore; (b) comply

with the Bankruptcy Code, the Bankruptcy Rules and the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York; (c) be filed with the Bankruptcy Court in accordance with General Order M-242 (as amended) (i) electronically by registered users of the Bankruptcy Court's case filing system, or (ii) on a 3.5 inch disk (preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format) by all other parties in interest (d) be delivered in hard copy form to the chambers of the Honorable Robert E. Gerber, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Room 621, New York, New York 10004; and (e) be served upon: Togut, Segal & Segal LLP, conflicts counsel for the Debtors and Debtors in Possession, One Penn Plaza, Suite 3335, New York, New York 10119 (Attn: Scott E. Ratner, Esq.), so as to be received no later than **5:00 p.m. (Eastern Time) on July 12, 2010** (the "**Response Deadline**").

PLEASE TAKE FURTHER NOTICE that only responses made in writing and timely filed and received by the Response Deadline will be considered by the Bankruptcy Court at the Hearing and that if no responses to the Cross-Motion are

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timely filed and served in accordance with the procedures set forth herein, the
Bankruptcy Court may enter an order granting the Cross-Motion without further notice.

Dated: New York, New York
June 18, 2010

MOTORS LIQUIDATION COMPANY (f/k/a
GENERAL MOTORS CORPORATION)
By its Conflicts Counsel
TOGUT, SEGAL & SEGAL LLP
By:

/s/ Scott E. Ratner
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